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Dennis P. Jamouneau
Assistant General Counsel

EP9628
701 Ninth Street NW
Washington, DC 20068-0001

Office 202.428.1122
Fax 202.331.6767
pepco.com
djamouneau@pepcoholdings.com

September 30, 2024

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street, NW, Suite 800
Washington, DC 20005

Re: Formal Case Nos. 1145, 1159, and 1168

Dear Ms. Westbrook-Sedgwick:

Pursuant to § 34-1313.07(b) of the D.C. Official Code ("D.C. Code"), and Order Nos. 19167, 20285, and 21105 issued by the Public Service Commission of the District of Columbia ("Commission"), and the Joint Stipulation of the Office of the People's Counsel ("OPC"), Potomac Electric Power Company ("Pepco") and the District Department of Transportation ("DDOT"), DDOT and Pepco (collectively, "Joint Applicants") hereby submit this Annual Status Report on Electric Company Infrastructure Improvement Activity ("Annual Report") as part of the District of Columbia Power Line Undergrounding ("DC PLUG") initiative.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

/s/ *Dennis P. Jamouneau*

Dennis P. Jamouneau

Enclosure

cc: All Parties of Record

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

IN THE MATTER OF	**)**	
APPLICATIONS FOR APPROVALS OF	**)**	
BIENNIAL UNDERGROUND	**)**	**Formal Case Nos. 1145, 1159, and 1168**
INFRASTRUCTURE IMPROVEMENT	**)**	
PROJECTS PLANS AND	**)**	
FINANCING ORDERS	**)**	

ANNUAL STATUS REPORT ON ELECTRIC COMPANY INFRASTRUCTURE IMPROVEMENT ACTIVITY

Pursuant to § 34-1313.07(b) of the D.C. Official Code ("D.C. Code"), and Order Nos. 19167, 20285, and 21105,[1] issued by the Public Service Commission of the District of Columbia ("Commission"), and the Joint Stipulation of the Office of the People's Counsel ("OPC"), Potomac Electric Power Company ("Pepco") and the District Department of Transportation ("DDOT"),[2] DDOT and Pepco (collectively, "Joint Applicants") hereby submit this Annual Status Report on Electric Company Infrastructure Improvement Activity ("Annual Report") as part of the District of Columbia Power Line Undergrounding ("DC PLUG") initiative.

I. BACKGROUND

On May 19, 2017, the Mayor signed into law the Electric Company Infrastructure Improvement Financing Emergency Amendment Act of 2017 (the "Amendment Act"),[3] which permanently amended the Electric Company Infrastructure Improvement Financing Act of 2014

[1] *In the Matter of Applications for Approval of Biennial Underground Infrastructure Improvement Projects Plans and Financing Order,* Formal Case No. 1145, Order No. 19167 ("Order No. 19167") at P 269 (Nov. 9, 2017); *In the Matter of Applications for Approval of Biennial Underground Infrastructure Improvement Projects Plans and Financing Orders*, Formal Case No. 1159, Order No. 20285 ("Order No. 20285") (Jan. 24, 2019); *In the Matter of the Applications for Approval of Biennial Underground Infrastructure Improvement Projects Plans and Financing Orders*, Formal Case No. 1168, Order No. 21105 (Jan. 27, 2022).

[2] *In the Matter of the Application for Approval of Triennial Underground Infrastructure Improvement Projects Plan*, Formal Case No. 1116, Joint Stipulation of the Office of the People's Counsel, Potomac Electric Power Company, and the District Department of Transportation (Sept. 15, 2014) ("Joint Stipulation").

[3] D.C. Law 22-05, effective July 11, 2017.

(the "Original Act")[4] (the Original Act, together with the Amendment Act is referred to as "the Undergrounding Act").[5] In accordance with the Undergrounding Act, on November 9, 2017, the Commission issued Order No. 19167, as clarified on January 18, 2018 by Order No. 19237,[6] approving the Joint Applicants' first Biennial Plan, the Underground Project Charge, the imposition of the DDOT Charge on Pepco, and the Underground Rider. Subsequently, on January 24, 2020, the Commission issued Order No. 20285, approving the Joint Applicants' Second Biennial Plan, the Underground Project Charge, the imposition of the DDOT Charge on Pepco, and the Underground Rider. Finally, on January 27, 2022, the Commission issued Order No. 21105, approving the Joint Applicants' Third Biennial Plan, the Underground Project Charge, the imposition of the DDOT Charge on Pepco, and the Underground Rider.

By September 30th of each year in which a biennial Underground Infrastructure Improvement Project Plan ("Biennial Plan") is not filed, D.C. Code § 34-1313.07(b) of the codified Undergrounding Act requires Joint Applicants to submit an Annual Report detailing what DC PLUG initiative work from the Biennial Plan was completed during the previous year and what further DC PLUG initiative work from the Biennial Plan is scheduled to be complete during the upcoming year.

In compliance with D.C. Code § 34-1313.07(b) and the referenced orders and in accordance with the Joint Stipulation, Pepco files this Annual Report on behalf of the Joint Applicants. All data presented below represents the available information as of September 30, 2024, unless otherwise noted.

[4] D.C. Law 20-102.
[5] To the extent there is any ambiguity, the term "Undergrounding Act" means the Original Act as it may be amended from time to time, including by the Electric Company Infrastructure Improvement Financing Amendment Act of 2015, Title II, Subtitle K of D.C. Law 21-36, effective October 22, 2015.
[6] *In the Matter of Applications for Approval of Biennial Underground Infrastructure Improvement Projects Plans and Financing Orders*, Formal Case No. 1145, Order No. 19237 (Jan. 18, 2018) ("Order No. 19237").

II. FEEDER 308

Undergrounding of Feeder 308 was completed in December 2020.

III. FEEDER 14900 Opportunity Project[7]

A portion of Feeder 14900 was constructed as an Opportunity Project under DDOT's federally-funded Oregon Avenue Reconstruction Project. Undergrounding of Feeder 14900 was completed in April 2023.

IV. FEEDER 368

Undergrounding of Feeder 368 was completed in December 2023.

V. FEEDER 15009

Civil construction of Feeder 15009 began in March 2023 and was completed in September 2024. Electrical construction is expected to begin in Q1 of 2025.

VI. FEEDER 14758

Civil construction of Feeder 14758 began in October 2023 and is expected to be completed in Q4 of 2024. Electrical construction is expected to begin in Q2 of 2025, following the completion of civil construction.

VII. FEEDER 14008

Civil construction of Feeder 14008 began in July of 2023 and is expected to be completed in Q4 of 2024. Electrical construction is expected to begin in Q1 of 2025, following the completion of civil construction.

VIII. FEEDER 15001

Civil construction of Feeder 15001 began in April 2024 and is expected to be completed in Q4 of 2026. Electrical construction is expected to begin following the completion of civil

[7] "Opportunity projects" are DC PLUG projects that take advantage of existing or planned DDOT roadway reconstruction projects to place an adjacent highly ranked feeder underground.

construction.

IX. FEEDER 15166

Civil construction of Feeder 15166 began in March 2024 and is expected to be completed in Q3 of 2025. Electrical construction is expected to begin following the completion of civil construction.

X. STATUS OF REMAINING FEEDERS IN THE FIRST BIENNIAL PLAN

The civil engineering designs for all Feeders in the first biennial plan have been completed. The civil construction status for Feeders 308, 14900, 368, 15009, and 14758 is noted above. Civil construction of Feeder 14007 is expected to begin in Q3 2025 and is expected to be completed in Q1 of 2027. Electrical construction is expected to begin following the completion of civil construction. The electrical design of Feeder 14758 is anticipated to be completed in November 2024. The electrical design of Feeder 15009 is anticipated to be completed in October 2024.

XI. STATUS OF REMAINING FEEDERS IN THE SECOND BIENNIAL PLAN

The civil construction status for Feeders 14008, 15166 and 15001 is noted above. The civil construction contract for Feeders 14702 and 118 is currently in procurement, expected to begin construction in Q1 of 2025 and expected be completed in Q4 of 2026. The 100% civil engineering designs for Feeders 15171, 14093, 15021, 467, and 14767 have been completed. The Civil Construction Invitations for Bids (IFB) for all Second Biennial Plan Feeders will follow completion of civil engineering design. Civil construction of Feeder 15171 is expected to begin in Q2 2025 and is expected to be completed in Q4 of 2026. Civil construction of Feeder 14093 is expected to begin in Q3 of 2025 and is expected to be completed in Q2 of 2027. Civil construction of Feeder 15021 is expected to begin in Q2 of 2025 and is expected to be completed in Q2 of 2028. Civil construction of Feeder 467 is expected to begin in Q3 of 2025 and is

expected to be completed in Q4 of 2026. Civil construction of Feeder 14767 is expected to begin in Q3 of 2025 and is expected to be completed in Q2 of 2028. The electrical engineering design procurement for all the above Feeders will commence following the start of the civil construction.

XII. STATUS OF FEEDERS IN THE THIRD BIENNIAL PLAN

The 100% civil engineering designs for Feeders 00075, 14009, 347 and 15174 have been completed. Civil construction of Feeder 00075 is expected to begin in Q3 of 2026 and is expected to be completed in Q3 of 2027. Civil construction of Feeder 14009 is expected to begin in Q2 of 2025 and is expected to be completed in in Q2 of 2026. Civil construction of Feeder 347 is expected to begin in Q2 of 2025 and is expected to be completed in Q2 of 2026. Civil construction of Feeder 15174 is expected to begin in Q2 of 2025 and is expected to be completed in Q4 of 2026. The Civil Construction Invitations for Bids (IFB) for all Third Biennial Plan Feeders will follow completion of civil engineering design. The electrical engineering design procurement for all the above Feeders will commence following the start of the civil construction.

XIII. DISTRIBUTION AUTOMATION

Pepco's distribution automation ("DA") design for the DC PLUG initiative feeders includes at least one mid-line interrupter and an automated feeder tie switch to adjacent feeders for 13kV feeders. The mid-line interrupter allows for automatic isolation of customers in the event of a fault past the location of the interrupter. The switches will be installed sufficiently far away from the substation such that Pepco will be able to use a 25kA rated device, instead of requiring a 40kA rated device. This serves to further control costs and allow Pepco to use products that are more readily available in the marketplace.

DA installation on Feeder 14722 was completed in October 2018, Feeder 15703 was completed in March 2021, Feeder 14786 was completed in December 2018, and Feeder 15004

was completed in October 2021.

Pepco is incorporating lessons learned from the pilot program and is planning to include interrupters in the DC PLUG feeders, where applicable.

Pepco has designed for 4 interrupters on Feeder 15174, 3 interrupters on Feeders 14758, 14093, and 15021, 2 interrupters on Feeders 14007, 15001, and 15009, and 1 interrupter on Feeders 14008, 14009, 14767, 15166, and 15171. Pepco's DC PLUG team is working internally with its distribution automation team to design more interrupters to be placed in service on other feeders as well. This process is still currently still in the design phase, but a study has already been completed which supports the need for installing additional interrupters on most of the 13kV Feeders.

XIV. DISTRICT BUSINESS OUTREACH AND ENGAGEMENT

In accordance with § 34-1311.02 (7) of the D.C. Code, the Joint Applicants' goal is to award "100% of the construction contracts to District businesses, where qualified to perform such work." To that end, and as noted in previous reports, DDOT designated the solicitation of civil construction for Feeder 308 as a set aside for Certified Business Enterprise ("CBE") bidders only, under the provisions of the Small and Certified Business Enterprise Development and Assistance Act of 2014.[8]

On September 26, 2014, Pepco released a Request for Proposal for professional civil engineering design services for Feeder 308. Civil engineering design services included the physical survey of above- and below-ground structures along the proposed route of the feeder and the design and creation of the schematics for the civil electric utility infrastructure required to place the feeder underground. A contract was awarded on November 3, 2014, and approximately 41% of the contract was awarded to a CBE firm, amounting to more than $630

[8] D.C. Code § 2-218.01.

thousand in contract value for the civil engineering work on Feeder 308.

Additionally, DDOT held a pre-bid conference for Feeder 308 back on February 27, 2018, for all interested bidders. DDOT then amended the IFB for Feeder 308 as a 100% CBE set aside on March 15, 2018. The IFB closed on May 24, 2018, and was awarded to a CBE on September 7, 2018. In March 2019, a CBE firm was awarded the Construction Management Contract for Feeder 308.

On September 18, 2018, DDOT issued a Request for Qualifications ("RFQ") for Program Management Services for the DC PLUG Program. A CBE Joint Venture was awarded this contract in January 2020. Option Years 1, 2 and 3 were subsequently exercised to retain the CBE Joint Venture through January 2025.

On May 7, 2019, DDOT issued an RFQ for the Design Services for the DC PLUG Program Biennial Plan 1. Two CBE firms were awarded contracts for this work in the second quarter of 2020. DDOT issued a separate RFQ for Design Services for the DC PLUG Program Biennial Plans 2 and 3 on May 8, 2020. Three CBE firms were awarded contracts for this work in 2020 and 2021.

On December 17, 2020, DDOT issued an RFQ for Construction Management and Inspection Services for the DC PLUG Program. Three CBE firms were awarded contracts for this work.

Further, the Joint Applicants continued their engagement of District of Columbia businesses by providing an update on the DC PLUG initiative at the September 29, 2017, Disadvantaged Business Enterprise ("DBE") Summit and jointly held a March 1, 2018 "match-making" event with 25 District-based DBEs. The Joint Applicants also sent out a request for information ("RFI") to over 150 District-based and local companies for project management, electrical construction, and electrical engineering. DDOT and Pepco also plan to release another RFI for companies that would be qualified as CBEs. Additionally, on May 15, 2018, the

Department of Small and Local Business Development held a meeting on strategies for pursuing government construction contracts to give vendors the opportunity to meet with representatives of the DC PLUG initiative. Finally, DDOT/FHWA held the Annual Disadvantaged Business Enterprise (DBE) Summit and Networking Symposium on November 12, 2019.

On April 2, 2018, Pepco hired a District of Columbia resident to serve as the Community Relations Coordinator to the DC PLUG team. The primary role of the Community Relations Coordinator is to act as the DC PLUG initiative's interface with customers and to execute the Education Plan.

On April 26, 2018, the Community Relations Coordinator provided an overview of the DC PLUG initiative to a group of leaders at the DC Federation of Civic Associations meeting. In addition, Pepco employee ambassadors have been attending and continue to attend community meetings to provide information to the community regarding the DC PLUG initiative. The Community Relations Coordinator will provide updates to the Undergrounding Project Consumer Education Task Force when necessary. Starting with Feeder 308, the Community Relations Coordinator created an outreach strategy targeting residents and businesses in the neighborhoods surrounding associated work with DC PLUG program feeders. The DC PLUG initiative website, email account, and phone hotline are all active as well and serve as tools and resources to notify residents as to the status of DC PLUG work in their neighborhood.

The Community Relations Coordinator has led efforts for the Education Plan and conducted targeted outreach to community stakeholders and residents. Prior to the COVID-19 pandemic, the DC PLUG team hosted quarterly Open Houses for Feeder 308, hosted a briefing for Ward 3 Councilmember Mary Cheh, attended the ANC 3E meetings and provided updates to the Western Avenue Citizens Association.

To get a head start on the outreach for Feeder 368, the DC PLUG team hosted a briefing

for Ward 7 Councilmember Vincent Gray and provided a presentation at the Ward 7 Leadership Summit.

In the Fall of 2019, the Community Relations Coordinator joined the Pepco Government Relations team in providing DC PLUG updates during a presentation to the Representatives of the Mayor's Office of Community Relations (MOCRs).

Historically, the DC PLUG team has been in touch with Councilmembers and ANCs virtually and have provided stakeholder outreach in the form of email, door hanger delivery or outbound phone calls. In April 2022, the DC PLUG Team launched a new, interactive DC PLUG website and actively maintains the website and email account to address stakeholder concerns.

The Joint Applicants continued their engagement of District of Columbia businesses by providing a Contractor's Forum for Certified Business Enterprises (CBE) on the DC PLUG initiative virtually on June 3, 2021. This event was attended by 57 firms. To continue the engagement of District of Columbia businesses, Pepco and DDOT hosted a second Contractor's Forum for Certified Business Enterprises on Thursday, October 12, 2023. This forum was held in person at the DDOT headquarters and attended by nearly 100 individuals. Joint Applicants also regularly communicate upcoming Invitations For Bids (IFB) with the DC National Utility Contractors Association (NUCA).

To further support the Education Plan, Pepco Communications partnered with a local, minority-owned, PR agency to launch a paid advertising campaign back on September 21, 2022, that has since concluded on December 19, 2022. The campaign was developed to increase awareness of the DC PLUG initiative and the project's commitment to deliver safe, affordable, and reliable energy for the District of Columbia today – and in the future. Using a combination of out-of-home (bus shelters), print (i.e., Washington Informer, Washington Post Local Living,

etc.), radio (i.e., WIHT, WKYS, and El Zol), and various digital and social media tactics, the campaign led customers to search DCPLUG.info to learn more about the project. In Q4 2022, Pepco released a Request for Proposal (RFP) to secure an agency to provide strategic oversight, creative development, media planning and placing, and account management for the DC PLUG initiative for a three-year period. A contract was awarded in Q1 2023 to a new local, minority-owned PR agency and re-launched a paid advertising campaign across the District of Columbia on April 28, 2023. As of September 20, 2023, general awareness – and new, Ward-specific – advertising is in the market across digital, social media, radio, print, and out-of-home channels. The DC PLUG paid campaign will run through the end of the project timeline. The paid campaign strategy includes raising general awareness of the DC PLUG initiative and its benefits throughout the District of Columbia and targeted to specific Wards in parallel with construction activities. Dynamic ads in English and Spanish can be seen on popular websites and social media, in local and diverse print publications, and heard on traditional radio stations. Out-of-home ads can be seen on the Metro, on buses and on digital screens throughout the District of Columbia.

XV. DESIGN AND CONSTRUCTION ALTERNATIVES

In the Joint Stipulation, the Joint Applicants agreed to consider design alternatives recommended by OPC in its protest, filed August 15, 2014 in the final design phase.[9] Those design alternatives include the use of single-phase cable (rather than three-phase cable), directional boring (rather than trenching), and pad-mounted transformers (rather than submersible transformers). In a subsequent stipulation, OPC and Pepco agreed that Pepco no longer had to pursue pad-mounted transformers as design alternatives.[10] The Joint Applicants

[9] Joint Stipulation at 4-5.

[10] *Motion to Approve Joint Stipulation and Joint Stipulation of the Office of People's Counsel, Potomac Electric Power Company, and the District Department of Transportation regarding consideration of Pad-Mounted Transformers for DC PLUG Initiative Feeders,* Formal Case No. 1116 (Mar. 8, 2016), *approved In the Matter of the Application for*

also agreed to provide specific information regarding the actual inclusion of design and construction alternatives identified by OPC and other parties, along with an explanation of the bases for inclusion or exclusion of various alternatives in the feeders for which final design has been completed.

A. Number of miles and location of single-phase cable included in the final design –

The Joint Applicants determined that the final electrical schematics for Feeder 308 called for approximately 1.5 miles of 600 Quad cable for the main trunk as well as 3.6 miles of #2 EPR three-phase cable and 3.1 miles of #2 EPR single phase cable for the laterals. The exact location of each type of cable was provided in the final electrical schematics for Feeder 308.

B. Locations where directional boring was sufficiently practical that it could be evaluated for feasibility

The civil engineering design contractor for Feeder 308 informed the Joint Applicants that there were no feasible locations along Feeder 308 where it would be practical to employ directional boring. The contractor indicated that directional boring would require 24x7 operations when drilling a particular run of pipe. This would cause traffic and noise impacts to residential neighborhoods served by Feeder 308. The contractor also indicated that directional boring would be made more difficult in the area of Feeder 308 by the presence of house laterals for water, sewer and gas at unknown depths in the boring path. Avoiding those lines would require the contractor to dig many test pits, thus increasing cost and time to complete the work as well as defeating the general purpose of directional boring. Finally, the contractor indicated that directional boring is generally used for long, underground runs. Feeder 308 is characterized by many short runs ranging from 100 to 600 feet, which would require significant setup time to dig launching and receiving pits, further increasing the time and cost to complete the project.

Approval of Triennial Underground Infrastructure Improvement Projects Plan, Formal Case No. 1116, Order No. 18154 (Mar. 24, 2016).

For these reasons, the Joint Applicants do not intend to further evaluate the feasibility of directional boring on Feeder 308.

C. Locations where directional boring was employed

No locations where directional boring would be feasible and cost-effective have been identified on any of the current feeders. The Joint Applicants do not employ directional boring on Feeder 308, or any other feeders under construction.

D. Number and location of ties constructed

Please see Section XVII ("Feeder Tie Points") below for a discussion of the tie points along Feeder 308.

XVI. OPPORTUNITIES TO LEAVE LINES OVERHEAD

In accordance with OPC's recommendation that the Joint Applicants work to identify sections of feeders that are cost-effective and practical to leave overhead, the Joint Applicants identified two sections of Feeder 308 that remain overhead. These overhead sections are reflected in the final civil engineering designs for Feeder 308. The first section is a 335-foot section along 44th Street. The second section is a 750-foot section along River Road. The 44th Street section, which serves only one customer, will remain overhead due to limited tree cover and service to only a single customer. The River Road section of Feeder 308 will remain overhead due to limited feasibility of placing of that section of the line underground.

Feeder 368 - A portion of Feeder 368 along Bowen Road between Ridge Road and 46th Street was left overhead stretching from north of Burns Street to 46th Street due to limited feasibility of placing of that section of the line underground.

Feeder 14758 - Sections of this feeder along Overlook Avenue SW, Galveston Street SW were left overhead due to limited tree cover. Section of the feeder extending along Blue Plains Drive SW from Martin Luther King Jr. Avenue SW was determined to be left overhead due to reliability improvement work that was done to upgrade that portion of the feeder to PAC cable.

Another portion of the feeder that extends south of Joliet Street SW and Martin Luther King Jr. Avenue SW was determined to be left overhead due to the limited feasibility of placing that section of feeder underground.

Feeder 15009 –A portion of the feeder along Blair Road NW, stretching from south of Kansas Avenue NW to south of Van Buren Street NW, was left overhead due to improved reliability, vegetation management, and limited feasibility of placing that section of feeder underground. After careful field investigation, it was determined that the portion of the feeder along Blair Road NW stretching from south of Kansas Avenue NW to south of Van Buren Street NW would be left overhead to due to proximity of to other utilities, improved reliability, the lack of R.O.W. space in a few areas, and clearance of tree coverage in others.

Feeder 14007 – Section of the feeder that runs along 13th Street NE between Kearny Street and Monroe Street NE and continues along Monroe Street NE between 13th and 15th Street NE was determined to be left overhead due to reliability improvement work that was done to upgrade that portion of the feeder to PAC cable.

Portion of the feeder along Bunker Hill Road NE, between 20th Street NE and 24th Street NE was determined to be left overhead due to limited tree cover and the feasibility of placing that section of feeder underground.

Feeder 15001 – Roughly 83% of the feeder will be undergrounded. Portions of the feeder will be left overhead due to limited feasibility of placing those sections of feeder underground, primarily the presence of existing transformers within the public alley ways. Because the transformer enclosures are not roadway rated and there being no issues of tree coverage, the transformers in the alleyways will remain overhead. There are two (2) additional transformers that, due to both their elevation from grade at the roadway and existence in the rear of residential properties that lie on a hill, will also be left overhead due to being inaccessible in addition to being on private property. Finally, there was also a section of the feeder along Piney Branch

Road NW, between Decatur Street NW and Emerson Street NW, that will be left overhead due to lack of R.O.W. space to underground facilities, as determined during the civil design survey.

Feeder 15166 – Due to limited feasibility, a portion along Newcomb Street SE, specifically a connection between two poles, is to remain overhead. Additionally, a portion of 2nd Street SE, specifically a connection of a new installed pole to an old pole, is to remain overhead due to no prior easement agreement. Portions of the feeder south of Malcom X Avenue were determined to be left overhead due to limited tree cover and due to planned load transfers and reliability improvement work in the area.

Feeder 14008 – Portion of the feeder along 18th Steet NE and small sections of feeder east of 18th Street NE were left overhead due to limited tree cover.

Feeder 14767 –Due to easement requirements, and the obligation to maintain traffic on W St. NW and Fox Hall Road north of W St. to remain overhead.

Feeder 347 – Portions of feeder were left overhead due to no easement in private property west of Naylor RD. Other location includes utilities along an alley way between 28th ST SE and Fort Baker DR due to underground structures not being possible in alley ways. 27th ST SE will be left overhead due to Parks and Services right-of-way.

XVII. FEEDER TIE POINTS

In the Joint Stipulation, Pepco agreed to analyze the need for each feeder tie point and share its findings in the semi-annual meetings and in the annual report.[11] Pepco is evaluating feeder ties on each of the DC PLUG feeders to make sure they conform to the Pepco standard that requires Pepco to be able to transfer the load off of a given feeder within four switching operations.

Through its analysis, Pepco has concluded that the ties between the Feeders will remain

[11] Joint Stipulation at 5.

to maintain operating flexibility and emergency backup for feeders. Pepco does not intend to construct any additional ties between Feeders as part of DC PLUG.

XVIII. MATERIAL SCHEDULE DELAYS, CHANGE ORDERS AND BUDGET OVERRUNS

In the Joint Stipulation, the Joint Applicants agreed to identify any material schedule delays, change orders and budget overruns, including those associated with DDOT's construction of duct line and manholes.[12] At this time the Joint Applicants have not identified any material schedule delays, change orders or budget overruns. The Joint Applicants will provide another update in the next semi-annual meeting and, as appropriate, in separate filings required by Order Nos. 20285 and 21105.[13]

XIX. JOINT-USE CONTRACTS

In the Joint Stipulation, Pepco agreed to provide an update of the status of its review of joint-use contracts in the Annual Report to determine whether there is an opportunity to increase fees charged to the communications companies who share Pepco poles.[14] Pepco has reviewed its joint-use contracts and determined that there are currently no opportunities to increase fees charged to the communications companies who share Pepco poles. If Pepco determines, in the future, that there is such an opportunity, it will address that opportunity in future Annual Reports.

XX. OBSTACLES

No significant obstacles have been identified at this time.

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[12] Joint Stipulation at 5.

[13] Paragraph 88 of Order No. 20285 directs that the Joint Applicants are directed to provide an explanation within 15 days whenever a delay of more than one month occurs with respect to: (1) the preparation of the final civil design; (2) the preparation of the final electrical design; (3) the award of civil engineering contracts; (4) the award of electrical engineering contracts; and (5) the estimated physical construction start date when compared to the preliminary Gantt Chart and estimated start and end date information which will be part of the 90-day Compliance Filing. *See also* Order No. 21105 at Paragraph 61.

[14] Joint Stipulation at 6.

ATTACHMENT A:

DC PLUG Biennial Plans Estimated Projects Schedule

DC PLUG First Biennial Plan Estimated Projects Schedule[15]

Ward	Feeder	Estimated Start Date*	Projected End Date **
3	308	7/2017	1
4	14900	7/2017	5/2023
7	368	2/2018	6/2024
5	14007	2/2018	3/2028
8	14758	2/2018	2/2026
4	15009	2/2018	5/2026

* Project Start Date
** Removal Project Closeout Date

DC PLUG Second Biennial Plan Estimated Projects Schedule

Ward	Feeder	Estimated Start Date*	Projected End Date**
7	118	1/2020	3/2027
5	14008	1/2020	1/2026
7	14702	1/2020	10/2027
8	15166	1/2020	6/2026
4	15001	1/2020	12/2027
5	14093	1/2020	11/2027
8	15171	1/2020	1/2028
3	14767	1/2020	2/2029
3	467	1/2020	3/2027
4	15021	1/2020	4/2029

* Project Start Date
** Removal Project Closeout Date

DC PLUG Third Biennial Plan Estimated Projects Schedule

Ward	Feeder	Estimated Start Date*	Projected End Date**
8	15174	1/2021	3/2028
7	347	1/2021	12/2026
3	75	1/2021	12/2027
5	14009	1/2021	4/2027

* Project Start Date
** Removal Project Closeout Date

CERTIFICATE OF SERVICE

I hereby certify that Potomac Electric Power Company's DC Plug Annual Status Report was sent to the recipients listed below on September 30, 2024 by electronic mail.

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street N.W. Suite 800
Washington, DC 20005
bwestbrook@psc.dc.gov

Sandra Mattavous-Frye, Esq.
People's Counsel
Office of People's Counsel
655 15th Street NW, Suite 200
Washington, DC 20005
smfrye@opc-dc.gov

Christopher Lipscombe
Public Service Commission of DC
1325 G Street NW, Suite 800
Washington, DC 20005
clipscombe@psc.dc.gov

Richard Herskovitz
Public Service Commission of DC
1325 G Street NW, Suite 800
Washington, DC 20005
rherskovitz@psc.dc.gov

John Howley
Public Service Commission of DC
1325 G Street NW, Suite 800
Washington, DC 20005
jhowley@psc.dc.gov

Laurence C. Daniels, Esq.
Office of People's Counsel
655 15th Street NW, Suite 200
Washington, DC 20005
ldaniels@opc-dc.gov

Karen R. Sistrunk, Esq.
Office of People's Counsel
655 15th Street NW, Suite 200
Washington, DC 20005
ksistrunk@opc-dc.gov

Poorani Ramachandran
Public Service Commission of DC
1325 G Street NW, Suite 800
Washington, DC 20005
pramachandran@psc.dc.gov

/s/ *Dennis P. Jamouneau*
Dennis P. Jamouneau